

Saturday, August 30, 2003

TO: F.C.C.

FROM: John C. Modlin (KD5UOR)

SUBJ: FCC Petitions requesting modification of Part 97 concerning elimination or modification of Element I, CW Testing.

I have read the petitions and have the following comments:

Concerning the petition submitted by **K1II**:

According to the U.S. Census Bureau there were 258474 Technician Class licenses in the U.S. as of the beginning of 2003. This represents 34.91% of a licensed HAM's in the U.S.. By granting Tech's additional frequency spectrums, this does not encourage a Technician class licensee to upgrade to General. In fact, this enhances capabilities they were given with their Technician class license based on a very limited knowledge of operating proficiencies. It is further ludicrous to give image spectrum to a class of license with no proven electronics skills whatsoever?

Concerning the petition submitted by **KG4QDZ, KG4YUM, and KG5QDY** regarding the elimination of Element I.:

It's curious to me how three Technician Class licensees who just obtained their license on June 10 of 2003 could influence a tradition of 100 years? Many of the HAM's I have talked to have said they didn't 'warm up' to CW for some time after they got their licenses. As an example, should we also eliminate the testing of electronics because people do not need to know electronics to push the button on the microphone? The invention of CW was not just about sending code, it was about using a switch to induce voltage and current into a circuit and send a radio signal into the atmosphere. For many people who are not familiar with electronics, learning to build and/or hookup a code key, and to use it, is part of the basic skills they would need in learning the electronics necessary to advance to higher licenses with the skills they've gained from using their lessor class licenses. Building blocks to a higher knowledge. Some will be capable, and some will not. This does not mean we should lower the bar of knowledge to the point it no longer presents a challenge, or HAM radio will be reduced to anyone who can push the button.

Concerning the petition submitted by **WA6BJH**:

There is no justification for the elimination of Element I, except for those who say it is 'antiquated technology'. In fact, so is SSB.

Concerning the petition submitted by **K8AD**:

My thought is that at a minimum, this is an option, but it's important to note the following:
As of the beginning of 2003, the U.S. Census Bureau reports that currently 34.91% of all HAM's in the U.S. are Technician Class licensees. If we combine all Novice, Technicians, and Technician Plus licensees into one big group by granting them all the privileges including eliminating Element I, the Technician Class license will become 53.69% of all the licensed HAM's in the U.S. Leaving 19.38% of Generals, 11.70% of Advanced, and 14.08% Extras. This means that over 50% of the people using HAM radio will be people who know little to nothing about electronics or how the equipment they are using works. With all the complaints I hear about improper procedures and abuse of the airwaves, not to mention total ignorance of the bandplans, this will only serve to increase the number of problems currently experienced on the air. I realize there is an assumption that many of the Technician Plus's will then upgrade to General. But I question this. As I said previously, 11.81% of all HAM's right now are Technician Plus Licensees. That represents 87,423 people in the United States, according to the U.S. Census Bureau. These HAM's have Morse Code Proficiency, yet are Tech Plus and not General Class licensees. Morse code cannot be the

deterrent for these 87,423 people. And clearly, some of these people have probably upgraded to General, and some will not. Not ALL licensees will upgrade, and should that be our goal? This is the reason we have 'classes' of licenses, to accommodate the different levels of skills we attain.

Concerning the petition submitted by **N0HHS**:

Eliminating Element I should not be considered.

Concerning the petition submitted by **NCVEC**:

I have the utmost respect for the folks volunteering their time to give tests and help the HAM community. Also, having to set up a tape recorder for testing is probably cumbersome at times. Most people I've found have a great deal of excitement and anticipation when taking their exams, especially Element I. I'm sure the VEC's hear a lot of this in their efforts to provide a great service to us all.

Often times things worth doing take time and effort.

I know a guy who failed Element I exam two times and passed the third. I was taking my Extra when he was going for his General in one sitting. I lent him the CW study tapes and my General Study Guide. He was angry in the beginning he had to study code, now he's elated to be a member of an organization who holds standards people can look up to. Not just button-pushers. And now, he's excitedly waiting for his equipment so he can get on the air with SSB and CW too. And he is of course upset that his effort is now diminished by petitions to eliminate the testing for CW all together. The VEC's saw only of course the testee's frustration of having to take the CW exam. One testee who failed the CW exam didn't know he could listen to WIAW to practice his code, so he missed out on a big study tool available free to everyone.

In Conclusion:

Eliminated Element I testing only lowers our standards. Raise the bar, don't lower it. Testing has already gone from 13wpm to 5wpm.

Keep Element I, at least for Extras.

Thank you for considering my opinions,

John C. Modlin
KD5UOR